

Purpose

The Connor Group responds to all reasonable accommodation and modification requests with “How can we help?” As required by the Fair Housing Act Amendments of 1988 (FHA) we will provide reasonable modifications to the property for our customers and residents with disabilities.

Expectation

- Under the FHA, residents may request that we make:
 - i. **Reasonable accommodations** – a change to a rule or property policy.
 - ii. **Reasonable modifications** – a change to the exterior or interior of the property or apartment.
- Generally, reasonable accommodation requests should be approved without requiring our residents to provide verification or evidence of their disability, our mindset is “How can we help?” and it’s important that we not add to a disabled resident’s burden when the need is obvious.
- That said, sometimes a disability is not obvious or observable or readily apparent. If a resident requests a reasonable accommodation but their need is not readily apparent our response does not change which is “How can we help?” but we will also need the resident to provide us with documentation from their health care provider (or other appropriate person) that gives us enough information about the disability to understand the relationship between the resident’s needs and the resident’s request.
- It is important to note that residents are not required to submit a reasonable accommodation request in any specific way. Whether a resident calls us on the phone, writes us a letter, or leaves us a message our response and obligation to the resident is the same.
- Residents making a request for reasonable modifications and alterations to an apartment must do so in writing.
- We are happy to allow the reasonable alteration if the resident is willing to pay for the changes (and if the modification is minor i.e. installing a shower handle) then we are happy to help with the installation.
- We will also require (and inform the resident of our expectation from the onset) that the apartment be returned to its original condition prior to them vacating the apartment, and that the resident will be expected to do this at their own expense. Obviously, and especially in situations where the modification is minimal and will not impact our ability to market the apartment, in some instances we do not always require the resident to restore the unit to its original condition (i.e. remove a shower handle).
- For requests to modify that are more complex, like a request for exterior alterations (such as ramps, rails, or other devices), those should be discussed with the Property Manager, the Regional Manager and CapEx prior to approval.
- It is the Property Manager’s responsibility to ensure that all associates are properly trained to answer questions from residents regarding reasonable accommodations and modifications, but it is also the associate’s responsibility to make sure that they discuss requests for reasonable accommodation and modification with their Property Managers for the benefit of the resident and the community

Procedure

What we do when a Resident Requests an Accommodation or Modification:

1. How can we help?
2. Let the resident know that we are happy to evaluate their request.
3. Tell the resident that we prefer it if they put their request in writing so that there is no confusion but let them know that it's not mandatory.
4. **Provide the resident with a timeline and set expectations:** Do not tell them that their request will definitely be approved. It is really important that we remember this when requests are made on the phone, which are often conducted by Fair Housing testers.
 - a. Let the resident know that the Property Manager will be reaching out to discuss the resident's request and obtain any necessary additional information.
 - b. Explain that the Property Manager will ultimately communicate the final determination.
 - c. Provide the resident with the Property Managers contact information or schedule a time with the resident to meet with the Property Manager by phone, in the office or in their home.
5. If the resident put their request in writing, scan it, email it to the Property Manager, and file the original in the Resident's file. If the Resident submitted the request orally, email a summary of the written request to the property manager and cc the resident on the email (so the resident has an opportunity to clarify the summary as written) then place a copy of that email in the resident's file.
6. Let the resident know that for installations related to a resident's request, we prefer they use an outside contractor to avoid any company liability.

Tools and Resources

- Knowledge of FHA laws